

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO**

Criminal Case No.24-cr-130-RMR

UNITED STATES OF AMERICA,

Plaintiff,

v.

1. DANIEL LARSON

Defendant.

INDICTMENT

The Grand Jury charges:

COUNT 1

On or about July 3, 2023, in the State and District of Colorado, the defendant, DANIEL LARSON, through the use of an instrument of interstate commerce, and in and affecting interstate commerce, willfully made a threat, and maliciously conveyed false information knowing the same to be false, concerning an attempt and alleged attempt being made, and to be made, unlawfully to damage and destroy a building and other real and personal property by means of an explosive, namely a particular county courthouse in Colorado.

All in violation of Title 18, United States Code, Section 844(e).

COUNT 2

On or about August 7, 2023, in the State and District of Colorado, the defendant, DANIEL LARSON, through the use of an instrument of interstate commerce, and in and

affecting interstate commerce, willfully made a threat, and maliciously conveyed false information knowing the same to be false, concerning an attempt and alleged attempt being made, and to be made, to unlawfully to damage and destroy a building and other real and personal property by means of an explosive, namely a particular nonprofit center in Lakewood, Colorado.

All in violation of Title 18, United States Code, Section 844(e).

COUNT 3

On or about August 29, 2023, in the State and District of Colorado, the defendant, DANIEL LARSON, through the use of an instrument of interstate commerce, and in and affecting interstate commerce, willfully made a threat, and maliciously conveyed false information knowing the same to be false, concerning an attempt and alleged attempt being made, and to be made, unlawfully to damage and destroy a building and other real and personal property by means of an explosive, namely the White House.

All in violation of Title 18, United States Code, Section 844(e).

COUNT 4

On or about September 26, 2023, in the State and District of Colorado, the defendant, DANIEL LARSON, through the use of an instrument of interstate commerce, and in and affecting interstate commerce, willfully made a threat, and maliciously conveyed false information knowing the same to be false, concerning an attempt and alleged attempt being made, and to be made, unlawfully to damage and destroy a

building and other real and personal property by means of an explosive, namely a state government building in Colorado.

All in violation of Title 18, United States Code, Section 844(e).

COUNT 5

On or about September 26, 2023, in the State and District of Colorado, the defendant, DANIEL LARSON, through the use of an instrument of interstate commerce, and in and affecting interstate commerce, willfully made a threat, and maliciously conveyed false information knowing the same to be false, concerning an attempt and alleged attempt being made, and to be made, unlawfully to damage and destroy a building and other real and personal property by means of an explosive, namely a particular college campus in Colorado.

All in violation of Title 18, United States Code, Section 844(e).

COUNT 6

On or about December 25, 2023, in the State and District of Colorado, the defendant, DANIEL LARSON, did knowingly transmit in interstate and foreign commerce a communication, containing a threat to injure the person of another, namely a particular Federal Bureau of Investigation special agent.

All in violation of Title 18, United States Code, Section 875(c).

COUNT 7

On or about March 23, 2024, in the State and District of Colorado, the defendant, DANIEL LARSON, through the use of an instrument of interstate commerce, and in and affecting interstate commerce, willfully made a threat, and maliciously conveyed false

information knowing the same to be false, concerning an attempt and alleged attempt being made, and to be made, unlawfully to damage and destroy a building and other real and personal property by means of an explosive, namely the Federal Bureau of Investigation headquarters.

All in violation of Title 18, United States Code, Section 844(e).

A TRUE BILL:

Ink signature on file in Clerk's Office
FOREPERSON

COLE FINEGAN
United States Attorney

By: s/Alison Connaught
Alison Connaught
Assistant U.S. Attorney
U.S. Attorney's Office
1801 California St., Ste. 1600
Denver, CO 80202
Telephone: 303-454-0200
Fax: 303-454-0406
E-mail: alison.connaught@usdoj.gov
Attorney for the Government

DEFENDANT: DANIEL LARSON

AGE/YOB: 26/1998

COMPLAINT FILED? _____ Yes No

HAS DEFENDANT BEEN ARRESTED ON COMPLAINT? _____ Yes No

OFFENSE(S):

Count 1: 18 U.S.C. §844(e) – Use or Threatened Use of Explosive Material

Count 2: 18 U.S.C. §844(e) – Use or Threatened Use of Explosive Material

Count 3: 18 U.S.C. §844(e) – Use or Threatened Use of Explosive Material

Count 4: 18 U.S.C. §844(e) – Use or Threatened Use of Explosive Material

Count 5: 18 U.S.C. §844(e) – Use or Threatened Use of Explosive Material

Count 6: 18 U.S.C. §875(c) – Interstate Communication of Threats

Count 7: 18 U.S.C. §844(e) – Use or Threatened Use of Explosive Material

LOCATION OF OFFENSE: Denver, Boulder, and Jefferson Counties, Colorado

PENALTY:

Count 1: NMT 10 years' imprisonment; NMT \$250,000 fine, or both; NMT 3 years' supervised release; \$100 Special Assessment.

Count 2: NMT 10 years' imprisonment; NMT \$250,000 fine, or both;

~~NMT 3 years' supervised release; \$100 Special Assessment.~~

~~Count 3: NMT 10 years' imprisonment; NMT \$250,000 fine, or both;~~

~~NMT 3 years' supervised release; \$100 Special Assessment.~~

Count 4: NMT 10 years' imprisonment; NMT \$250,000 fine, or both; NMT 3 years' supervised release; \$100 Special Assessment.

Count 5: NMT 10 years' imprisonment; NMT \$250,000 fine, or both; NMT 3 years' supervised release; \$100 Special Assessment.

Count 6: NMT 5 years' imprisonment; NMT \$250,000 fine, or both; NMT 3 years' supervised release; \$100 Special Assessment.

Count 7: NMT 10 years' imprisonment; NMT \$250,000 fine, or both; NMT 3 years' supervised release; \$100 Special Assessment.

AGENT: Daniel MacDougall, TFO, FBI

AUTHORIZED Alison Connaughty
BY: AUSA

ESTIMATED TIME OF TRIAL:

five days or less; over five days

THE GOVERNMENT

will seek detention in this case based on 18 U.S.C. § 3142(f)(1)

The statutory presumption of detention is **not** applicable to this defendant.